



July 10, 2018

Ms. Marlene H. Dortch
Secretary
Office of the Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: CG Docket No. 03-123, *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, and CG Docket No. 13-24, *Misuse of Internet Protocol (IP) Captioned Telephone Service*

Dear Ms. Dortch:

The undersigned and Roger Fleming of Northfork Strategies met on July 9, 2018 with Commissioner Michael O'Reilly and his Wireline Legal Advisor Amy Bender on behalf of IDT Telecom, Inc. ("IDT"). We discussed the Commissioner's separate statement approving in part and concurring in part with the Commission's Report and Order, Declaratory Ruling, Further Notice of Proposed Rulemaking, and Notice of Inquiry in the dockets captioned above concerning telecommunications relay services ("TRS") and released by the Commission on June 8, 2018. We discussed Sec. 225(b)(2) of the Communications Act ("the Act") which grants to the Commission the same authority, power, and functions with respect to providers of intrastate communications as the Commission has with respect to providers of interstate communications, for purposes of administering and enforcing Sec. 225. We observed that the specific jurisdiction conferred by Sec. 225 does not disturb, inform, or otherwise affect any limits on the Commission's jurisdiction over other services and other providers that may exist pursuant to other provisions of the Act. We also observed that no jurisdictional separation of carrier costs is required for the Commission to include intrastate revenues in the revenue base it uses to calculate the TRS contribution factor and thus such an expansion would require no Commission action pursuant to Sec. 410 of the Act.

Sincerely,

A handwritten signature in cursive script that reads 'Colleen Boothby'.

Colleen Boothby
Counsel, IDT Telecom, Inc.

cc: Commissioner O'Reilly
Amy Bender